NVIRO

February 5, 1999

U.S. Environmental Protection Agency 2890 Woodbridge Avenue Bldg. 209 (MS-211) Edison, New Jersey 08837

Attention: Cornell-Dubilier Electronics Site On-Scene Coordinator

Chief, New Jersey Superfund Branch Office of Regional Counsel United States Environmental Protection Agency 290 Broadway, 17th Floor New York, New York 10007-1866 Attention: Cornell-Dubilier Electronics Site Attorney

Re: Cornell-Dubilier Electronics Site - Administrative Order on Consent for Removal

Action, Index No. II-CERCLA-98-0115

Progress Report No. 11 and 12

Dear Sirs:

As specified in Paragraph 50 of the above-referenced Administrative Order, on behalf of Respondent Cornell Dubilier Electronics, Inc. (CDE), ENVIRON Corporation (ENVIRON) is submitting this progress report which summarizes activities conducted pursuant to this AOC between December 31, 1998 and January 27, 1999.

Completed Activities

During this period, the following activities were completed:

- Preparation of detailed removal action specifications. Specifications were included in the request for contractor bid for excavation and restoration activities. The request for contractor bids for excavation and restoration activities was issued on January 8, 1999. (Excavation plans included in this bid package were provided to USEPA on December 28, 1998.)
- Implementation of the verification sampling program described in the Revised Residential Property Removal Action Work Plan, South Plainfield, New Jersey ("Work Plan") approved by USEPA on December 7, 1998. Sampling location mark-out was conducted on January 4 and 5, 1999, and sampling activities were conducted on January 4, 5, 6, 7, 13 and 14, 1999.
- Request for utility identification and mark-out on Properties E and I through the New Jersey One Call service. The request was placed on January 6. 1999 and identification was completed by January 11, 1999.

- Identification and scheduling of a geoprobe subcontractor to complete sampling of Properties E and I. USEPA's oversight contractor was verbally notified of the potential change in sampling approach on January 7, 1999. USEPA was notified via e-mail of the planned change to use geoprobe for sample collection on January 12, 1999. This notice also identified the contractor selected to perform the work. Geoprobe sample collection was conducted on January 13 and 14, 1999.
- Verbal notification to the owners of Properties E and I on January 6, 1999 regarding rescheduling of verification sampling on these properties from the week of January 4, 1999 to the week of January 11, 1999. Owners were also informed of the scheduled utility mark-out during the weeks of January 4, 1999 and/or January 11, 1999.
- Verbal request to the owner of Property N regarding new address information; owner was contacted on January 6, 1999.
- Verbal notification to the owners of Properties E and I on January 12, 1999 regarding scheduling of field work and utilization of the geoprobe contractor on these properties on January 13 and 14, 1999.
- Verbal notification to owners of the six properties on January 13, 1999 regarding a planned pre-bid site visit with prospective remediation contractors. Prospective remediation contractors were provided with an inspection of the six properties on January 14, 1999.
- Submittal of waste characterization soil sample to Clean Earth Recycling in New Castle, Delaware on January 19, 1999.

Ongoing Activities

During this period, the following activities were initiated and/or are in-progress:

- Preparation of a soil erosion and sediment control plan for soil excavation activities.
- Preparation of waste profile applications for submittal to G.R.O.W.S. Landfill in Morrisville, Pennsylvania and to Clean Earth Recycling in New Castle, Delaware.
- Laboratory analysis of soil samples collected during the period of January 5 to January 14, 1999.
- Review of unvalidated verification sampling results and implementation of statistical data assessment procedures as described in the Work Plan.

Two-Week Schedule of Planned Activities

During the next two-week period (January 28, 1999 through February 10, 1999) the following activities are planned:

- Submittal of a soil erosion control plan to the Freehold Soil Conservation District.
- Preparation of waste profile applications for submittal to G.R.O.W.S. Landfill in Morrisville, Pennsylvania, Clean Earth Recycling in New Castle, Delaware, and CWM Chemical Services in Model City, New York.
- Contact Borough of South Plainfield regarding work to be performed on rightof-way areas and property adjoining Property I.

One-Month Schedule of Planned Field Activities

During the next four-week period (January 27, 1999 through February 24, 1999), no field activities are planned.

Please call me or Mark Nielsen at (609) 452-9000 if you should have any questions regarding this progress report.

Sincerely,

Michael P. Scott

Principal

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cc: R. Sanoff, Esq.